



LAW FIRM OF
OMAR T. MOHAMMED, LLC

233 BROADWAY, SUITE 820
WOOLWORTH BUILDING
NEW YORK, NY 10279
PHONE (212) 725-3846
FACSIMILE (212) 202-7621
WWW.OTMLAW.COM

OMAR T. MOHAMMED, ESQ.
DIRECT DIAL: (212) 725-3846 x101
EMAIL: OMOHAMMED@OTMLAW.COM

ADMITTED: NEW YORK, EIGHTH CIRCUIT
SECOND CIRCUIT, ALGERIAN BAR
US COURT ON INTERNATIONAL TRADE

October 25, 2018

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

This firm represents Defendants World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International (collectively referred to as “WAMY”). We write regarding the Court’s Order dated August 29, 2018 (DKT # 4130), setting a deadline of October 29, 2018 for WAMY to produce certain documents¹ and proffer declarations as to WAMY’s search and production efforts. We respectfully seek the following: (1) an additional two (2) weeks from Monday, October 29, to submit all declarations Ordered by the Court and any responsive new documents not previously produced on November 12; and (2) an additional four (4) weeks from Monday, October 29, to reproduce documents initially redacted for donor names on November 26. The Plaintiffs’ Executive Committee (“PEC”) has consented to this extension.

Pursuant to Your Honor’s instructions, undersigned counsel has been judiciously working with WAMY these past 60 days to comply with the Order, including re-performing thorough searches to collect responsive documents and supervising searches to ensure that the delineated documents are properly gathered and produced. WAMY has also been identifying all documents

¹ Documents responsive to PEC’s fourth set of document requests; reports, meeting minutes, and other documents from WAMY’s governing bodies, boards, and committees, as well as a declaration detailing WAMY’s efforts to locate such documents; annual reports for 1992, 1993, and 1995; documents regarding WAMY’s relationship with the Saudi government, as well as a declaration detailing WAMY’s efforts to locate such documents; documents relating to the Benevolence International Foundation, as well as a declaration detailing WAMY’s efforts to locate such documents; and documents regarding WAMY’s relationship with or financial support for Hamas, Fatah, and the Palestinian Islamic Jihad, as well as a declaration detailing WAMY’s efforts to locate such documents.

LAW FIRM OF
OMAR T. MOHAMMEDI, LLC

that were previously redacted and preparing them for production, unredacted. Given the scope of WAMY's production, this has been a sizeable undertaking.

Consequently, WAMY respectfully seeks an extension, as detailed above, to its October 29, 2018 production deadline. Thank you for your time and consideration of this request.

Respectfully Submitted,

/s/ Omar Mohammedi
Omar Mohammedi, Esq.

/s/Fredrick Goetz
Frederick Goetz, Esq.

cc: All MDL Counsel of Record (via ECF)